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SECRET WATERFALL LLC,
7 LAUNCELOT A. DEVAULT, AND
TARAH A. UHRICH

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

RAINBOW S.p.A.,

Plaintiff,

v.

SECRET WATERFALL LLC,
LAUNCELOT A. DEVAULT,
TARAH A. UHRICH, STARLINE
MEDIA, INC., AND DAVID
NDALAMBA,

Defendant.

Case No. 5:25-0597-MRA(DTBx)

**DEFENDANTS' STATEMENT
REGARDING PLAINTIFF'S
MOTION FOR LEAVE TO AMEND
COMPLAINT**

Judge: Hon. Monica Ramirez Almadani
Crtrm.: 10B

Defendants Secret Waterfall LLC, Launcelot A. Devault, and Tarah Uhrich (collectively “Secret Defendants”) hereby submit the following statement regarding Plaintiff’s Motion for Leave to Amend Complaint (Dkt. 28).

4 Secret Defendants do not, in principle, oppose Plaintiff's motion for leave to
5 file a Third Amended Complaint. Dkt. 28. In filing this statement, Secret Defendants
6 do not waive any defense or their right to challenge the sufficiency of the pleadings
7 themselves.

8 Plaintiff's proposed Third Amended Complaint, however, contains 1,350
9 paragraphs, and is 380 pages long. Dkt. 28-1. The proposed Third Amended
10 Complaint contains 72 counts, including 66 counts of copyright infringement
11 relating to separate copyrights. *Id.* In view of the number of counts and copyrights at
12 issue, Secret Defendants respectfully request forty-five days to respond to Plaintiff's
13 Third Amended Complaint.

16 | Dated: November 10, 2025 BERGESON LLP

Attorneys for Defendants
SECRET WATERFALL LLC,
LAUNCELOT A. DEVAULT, AND TARAH
A. UHRICH